

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SOLOMON CHAU, Derivatively on Behalf
of TESLA, INC.,

Plaintiff,

v.

ELON MUSK, ROBYN DENHOLM,
KIMBAL MUSK, IRA EHRENPREIS,
JAMES MURDOCH, LAWRENCE J.
ELLISON, KATHLEEN WILSON-
THOMPSON,
HIROMICHI MIZUNO,
ANTONIO J. GRACIAS, STEPHEN T.
JURVETSON, BRAD W. BUSS, and
LINDA JOHNSON RICE,

Defendants,

-and-

TESLA, INC., a Delaware Corporation,

Nominal Defendant.

Case No.: 1:22-cv-00592-LY

MOTION FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Doru Gavril, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc. in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm Freshfields Bruckhaus Deringer US LLP, with offices at:

Mailing address: 855 Main Street
Redwood City, California 94063

Telephone: (650) 421-8200

Facsimile: (212) 277-4001

Email: doru.gavril@freshfields.com

2. Since April 7, 2012, Applicant has been and presently is a member of and in good standing with the Bar of California. Applicant's California bar license number is 282309.

3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
California Supreme Court	Apr. 7, 2012
California Court of Appeals, 6th District	Sept. 27, 2021
U.S. Court of Appeals for the Ninth Circuit	June 3, 2019
U.S. District Court for the Central District of California	Oct. 8, 2018
U.S. District Court for the Northern District of California	Nov. 8, 2012
U.S. District Court for the District of Colorado	Oct. 29, 2021

4. Applicant is presently an active member in good standing of the courts listed above.
5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.
6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses (omitting minor traffic offenses).
7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

8. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Gary Ewell
TX Bar No. 06752800

Mailing address: 111 Congress Avenue, Suite 2800
Austin, Texas 78701

Telephone: (512) 770-4030

Facsimile: (877) 851-6384

Email: gewell@ebbklaw.com

9. Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2), with checks made payable to: Clerk, U.S. District Court.
10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to the Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

WHEREFORE, Applicant prays that this Court enter an Order permitting the admission of Doru Gavril to the Western District of Texas *pro hac vice* for this case only.

Dated: July 8, 2022

Respectfully submitted,

/s/ Doru Gavril

Doru Gavril
California Bar No. 282309
Freshfields Bruckhaus Deringer US LLP
855 Main Street
Redwood City, California 94063
(650) 421-8200
(212) 277-4001 (fax)
doru.gavril@freshfields.com

Attorney for Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this 8th day of July, 2022.

/s/ Doru Gavril

Doru Gavril